

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JUAN R ESCOBAR DEBIEN

DEBTOR(S)

CASE NUMBER: 11-02120

CHAPTER 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to provide for co-debtor claim with BPPR.

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 27th day of April of 2011.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 11-02120-13

ESCOBAR DEBIEN, JUAN RAUL

Chapter 13

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>4-27-2011</u> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE		II. DISBURSEMENT SCHEDULE	
$\$ \quad 310.00 \times \quad 60 = \$ \quad 18,600.00$ $\$ \quad \times \quad = \$$ $\$ \quad \times \quad = \$$ $\$ \quad \times \quad = \$$ $\$ \quad \times \quad = \$$ TOTAL: \$ <u>18,600.00</u>		A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>Doral Financial Corp</u> Cr. <u>Oriental Bank</u> Cr. _____ # <u>8930070027348</u> # <u>61010010011455</u> # _____ \$ _____ 4,300.00 \$ _____ 9,150.00 \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: 5. <input type="checkbox"/> Other: 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <u>Doral Financial Corp</u> <u>Oriental Bank</u> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input checked="" type="checkbox"/> Classifies <input type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input checked="" type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input checked="" type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. <u>BPPR</u> Cr. _____ Cr. _____ # <u>1860</u> # _____ # _____ \$ _____ 251.45 \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,604.00</u>		OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5). ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330. TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.	
Signed: <u>/s/ JUAN RAUL ESCOBAR DEBIEN</u> Debtor Joint Debtor			

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Label Matrix for local noticing
0104-3
Case 11-02120-ESL13
District of Puerto Rico
Old San Juan
Wed Apr 27 09:38:50 AST 2011

US Bankruptcy Court District of P.R.
U.S. Post Office and Courthouse Building
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PR 00936-6818

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San Juan, PR 00936-0998

Doral Financial Corp
PO BOX 71529
San Juan, PR 00936-8629

Gemb/paypal Smart Conn
Po Box 981064
El Paso, TX 79998-1064

Oriental Bank
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Po Box 2036
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Banco Popular De Puert
209 Munoz Rivera Ave
San Juan, PR 00918-1000

Credit Protection Asso
13355 Noel Rd Ste 2100
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FIRST FINANCIAL PORTFOLIO MANAGEMENT INC
c o Jefferson Capital Systems LLC
PO BOX 7999
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Po Box 981400
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End of Label Matrix
Mailable recipients 25
Bypassed recipients 0
Total 25